

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

Form OBD-68
(Rev 10-14-76)
Formerly DJ-307
for

AMENDMENT TO REGISTRATION STATEMENT

Pursuant to the Foreign Agents
Registration Act of 1938, as amended.

RECEIVED
CRIMINAL DIVISION
MAR 13 4 44 PM '82
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

1. Name of Registrant ARNOLD & PORTER	2. Registration No. 1750
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3. This amendment is filed to accomplish the following indicated purpose or purposes:

- ☐ To correct a deficiency in
- ☐ Initial Statement
- ☐ Supplemental Statement for _____
- ☐ To give notice of change in an exhibit previously filed.
- ☒ To give a 10-day notice of a change in information as required by Section 2(b) of the Act.
- ☐ Other purpose (specify) _____

4. If this amendment requires the filing of a document or documents, please list -

Exhibits A and B

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. If more space is needed, full size insert sheets may be used.

This amendment to Registrant's Registration Statement is to give notice of a new foreign principal of the Registrant, The Metal Market and Exchange Company, Ltd. (London Metal Exchange), and to file the necessary Exhibits A and B.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this amendment and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief.

(Both copies of this amendment shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Brooksley E. Landau
Brooksley E. Landau, Partner

Subscribed and sworn to before me at

this 12 day of

March, 1982

My commission expires

Oct. 31, 1984

Patricia H. Davis
(Notary or other officer)

EXHIBIT A

TO REGISTRATION STATEMENT

Under the Foreign Agents Registration Act of 1938, as amended

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant

ARNOLD & PORTER

2. Registration No.

1750

3. Name of foreign principal

The Metal Market and Exchange Company,
Ltd. (London Metal Exchange)

4. Principal address of foreign principal

Plantation House
Fenchurch Street
London EC3M 3AP England

5. Indicate whether your foreign principal is one of the following type:

☐ Foreign government

☐ Foreign political party

☒ Foreign or ☐ domestic organization: If either, check one of the following:

☐ Partnership

☐ Committee

☒ Corporation

☐ Voluntary group

☐ Association

☐ Other (specify) _____

☐ Individual - State his nationality _____

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6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant.

N. A.

b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

a) Principal address

N. A.

b) Name and title of official with whom the registrant deals.

c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

The foreign principal is a commodity exchange for trading
metals.

TERMINATED
DATE 6-8-82

b) Is this foreign principal

Owned by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐

Directed by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐

Controlled by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐

Financed by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐

Subsidized in whole by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐

Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

To the best of our information, the foreign principal is owned by foreign interests including its member firms.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N. A.

Date of Exhibit A March 18, 1982	Name and Title Brooksley E. Landau, Partner	Signature <i>Brooksley E. Landau</i>
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UNITED STATES DEPARTMENT OF JUSTICE
Washington, D.C. 20530

EXHIBIT B

TO REGISTRATION STATEMENT
Under the Foreign Agents Registration Act
of 1938, as amended

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INTERNAL SECURITY
SECTION
REGISTRATION UNIT

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant

ARNOLD & PORTER

Name of Foreign Principal

The Metal Market and Exchange
Company, Ltd. (London Metal Exchange)

Check Appropriate Boxes:

1. ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
2. ☐ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
3. ☒ The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

See answer to Number 4, below.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

The Registrant will assist in preparing testimony and other position papers relating to proposed legislation for reauthorization of the Commodity Futures Trading Commission on behalf of other foreign principals of the Registrant, in which The Metal Market and Exchange Company, Ltd. (London Metal Exchange) will be joining. The fee for such representation will be paid by other foreign principals of the Registrant.

TERMINATED

DATE 6-23

5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

The Registrant will assist in preparing testimony and other position papers relating to proposed legislation for reauthorization of the Commodity Futures Trading Commission on behalf of other foreign principals of the Registrant, in which The Metal Market and Exchange Company, Ltd. (London Metal Exchange) will be joining.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act? ^{1/} Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The Registrant may engage in political activities on behalf of the foreign principal. The Registrant's activities may on occasion include communications on behalf of the foreign principal with Executive Branch officials, officials of government agencies, and with members of the U. S. Senate and House of Representatives and their staffs relating to proposed legislation for reauthorization of the Commodity Futures Trading Commission.

Date of Exhibit B	Name and Title	Signature
March 18, 1982	Brooksley E. Landau, Partner	<i>Brooksley E. Landau</i>

^{1/} Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.